

SHARI RUSK
Attorney at Law
916 2nd Ave., 2nd flr
Sacramento, CA 95814
Telephone: (916) 804-8656

Attorney for Defendant
IGNACIO VALENCIA

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

IGNACIO VALENCIA,

Defendant.

CASE NO. 2:25-CR-0016-TLN

STIPULATION REGARDING EXCLUDABLE
TIME PERIODS UNDER SPEEDY TRIAL ACT;
ORDER

DATE: February 13, 2025
TIME: 9:30 a.m.
COURT: Hon. Troy L. Nunley

STIPULATION

1. By previous order, this matter was set for status on February 13, 2025.
2. By this stipulation, defendant now moves to continue the status conference until April 10, 2025, at 9:30 a.m., and to exclude time between February 13, 2025, and April 10, 2025, under Local Code T4.
3. The parties agree and stipulate, and request that the Court find the following:
 - a) The government has represented that it will be producing discovery associated with this case which will include 17 GB of data, multiple BWC and dash cam videos and several hundred pages. All of this discovery will be produced directly to counsel and/or made available for inspection and copying.
 - b) On February 2, 2025, attorney Shari Rusk was appointed as new counsel of record for defendant Ignacio Valencia.

1 c) The government is making good faith efforts to produce discovery. Counsel for
2 defendant will need time to review the discovery, to review the charges and potential responses
3 to the charges with her client, to conduct factual investigation and legal research, and to
4 otherwise prepare for trial.

5 d) Counsel for defendant believes that failure to grant the above-requested
6 continuance would deny her the reasonable time necessary for effective preparation, taking into
7 account the exercise of due diligence.

8 e) The government does not object to the continuance.

9 f) Based on the above-stated findings, the ends of justice served by continuing the
10 case as requested outweigh the interest of the public and the defendant in a trial within the
11 original date prescribed by the Speedy Trial Act.

12 g) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
13 et seq., within which trial must commence, the time period of February 13, 2025 to April 10,
14 2025, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code
15 T4] because it results from a continuance granted by the Court at defendant's request on the basis
16 of the Court's finding that the ends of justice served by taking such action outweigh the best
17 interest of the public and the defendant in a speedy trial.

18 4. Nothing in this stipulation and order shall preclude a finding that other provisions of the
19 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial
20 must commence.

21 IT IS SO STIPULATED.

22
23
24 Dated: February 4, 2025

MICHELE BECKWITH
Acting United States Attorney

25
26 /s/ Nicole Vanek
Nicole Vanek
Assistant United States Attorney
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1 Dated: February 4, 2025

/s/ Shari Rusk

Shari Rusk
Counsel for Defendant
IGNACIO VALENCIA

6 **ORDER**

8 IT IS SO FOUND AND ORDERED this 7th day of February, 2025.

10 
12 Troy L. Nunley
13 Chief United States District Judge